



Forward

The Harlow Alliance Party was formed by a number of Harlow residents in late January 2018. We are concerned that Harlow District Council (HDC) are failing in their duty to consult with residents, are failing to take account of their views when they do consult and do not provide any feedback to residents when decisions are made. Evidence of this can be found when looking at the lack of effort they made to consult with residents when forming their own Local Plan, but the approach taken then mirrors much of the issues which we wish to make in this submission.

Epping Forest District Council's (EFDC) Local Plan

In the forward to this document, Epping Forest District Council (EFDC) Councillors Chris Whitbread and John Phillip state at the outset that "this Plan is not the Council's but rather a Plan which belongs to all of us in our area" and goes on to say that residents have helped in preparing this emerging Plan.

The EFDC area covers some 120 square miles and residents across this wide area have had the opportunity to comment at various stages leading up to the final edition of the Plan. We understand that some 3000 submissions were made to EFDC earlier in the process and 991 were received in response to the pre submission document.

2.2 to 2.7 Strategic Planning and meeting the duty to co-operate

This part of the document makes it clear that Public Bodies have a duty to co-operate and that the Government expects joint working to take place. In this case four Local Authorities came together and signed a Memorandum of Agreement.

The Plan proposes some 11400 homes being built across the EFDC District, of which thousands will be on the immediate borders of Harlow, in many cases literally over the garden fence of residents living here. In addition, thousands of homes are proposed for the Gilston Garden Town site adding significant strain on an already under pressure infrastructure including roads, schools and healthcare.

The case that the Harlow Alliance Party wishes to make is that the residents of Harlow, who will in fact be most affected by these proposals, have had little if any opportunity to participate in the consultation process, they have not been provided with any feedback when they have been consulted or advised of when and how they could comment on EFDC's Pre Submission Document.

The launch of HAP took place just as EFDC's consultation period in respect of its Plan ended. We hastily got some residents living on the Southern and South Western borders of Harlow to sign the petition which we submitted to EFDC.

Since then we have spoken to hundreds of residents about the Plan, very few had any idea of what plans were being made by the four Local Authorities for land in close proximity to their homes.

It is clear that despite the joint working arrangements previously mentioned, the outcomes did not include any reasonable attempt to consult with residents of Harlow about these plans despite the fact that they will be directly affected by them. HAP believe it is not acceptable that residents living in for instance Chigwell, part of the EFDC District some 10+ miles away could make comments about this Plan but residents in Harlow have had little or no opportunity to do so. So lets take a look at the three 'parcels' of land in question and what was done to consult with residents in Harlow and the comments that we have been made aware of since:

Latton Priory

A series of 3 exhibitions were held in October 2013. The first was at a nearby school in Harlow, the second, in North Weald, over a mile away and thirdly, perhaps most interestingly, in Nazeing, which even as the crow flies is nearly 3 miles from the site. Whilst it is clear that these exhibitions were advertised in the EFDC area, households in only a very small part of Harlow close to the development were sent invites to the exhibition. I attended this exhibition for about an hour and saw or heard no-one in favour of the development. Concerns were expressed about the loss of Green Belt land, the massive increase in road congestion that will occur on estate roads nearby and the rat run which will be created by giving access to the M11 junction without any improvements to roads leading south. Despite filling in a form with my details, I never received any feedback in respect of the development, about progress of EFDC's Local Plan, any changes to the original proposal or the deadline for responses to EFDC's Pre Submission document. We have found no-one who has received any such feedback.

Land Adjacent to Sumners

We understand from some residents that they did attend an exhibition in 2012/2013 about proposals to build here but they had never received any feedback and were not aware of EFDC's Local Plan. It was pointed out that numerous residents had since moved on and others moved in and these residents were not aware of any proposals to build homes nearby. Concerns have again been expressed about the loss of green belt land, effectively bridging the gap with homes in the neighbouring District and adding to the problem of already heavily congested roads, the lack of health facilities and where older children would be able to go to school.

Land adjacent to Katherines

It appears that there has never been any attempt by EFDC to bring the proposed development to the attention of Harlow residents in this area. Literally no-one we have spoken to was aware that homes were being proposed on land just the other side of a ditch and hedge from their own homes. The same concerns have been expressed by residents at Sumners. The problem of traffic entering and exiting this estate of some 1500 homes via just one road is already at times very difficult, the thought that hundreds more could be built nearby is of great concern to residents.

HAP believe that the comprehensive joint working arrangement between all four Local Authorities should have included a joint strategy for consulting with residents across the whole area covered by these authorities. They clearly did not have such an approach. Involving residents has been piecemeal, in Harlow District Council's case almost non-existent, a matter which we will be taking up in earnest when its Local Plan comes before the Inspector.

Harlow Council produced a document for its Members and staff in the 1990's called "Consultation, a guide to good practice". Key points in the document were:

To use various methods to consult with residents, taking into account those who do not have access to the internet, those that do not have English as their first language, to hold public meetings and exhibitions at different times of the day and week and to provide feedback as to why and when decisions would be made.

HAP believes that it should have used this good practice as part of the joint working between the four Local Authorities.

So what should have been done?

HDC produces a magazine four times a year called "Harlow Times", which is delivered to every household in the town. This should have been used by **the four Local Authorities** to explain their joint working arrangements, to publicise the draft Plans as they were developed, giving an opportunity for all residents to comment and to provide feedback to them once the consultation was completed/.

In drawing up its Local Plan HDC met with just THREE residents groups in the town, a sad indictment of the efforts they made to involve residents. There are literally dozens of local groups in Harlow, including resident associations, tenants groups set up by HDC itself, interest groups and for instance a U3A with over 900 members. Exhibitions/meetings hosted by the **four Local Authorities** should have been set up with these groups so that residents could have been involved in the development process.

Public exhibitions should have been held in various locations across Harlow. The Harvey Centre in Harlow's main shopping area would have provided the ideal location to do this. The design of Harlow with its distinct neighbourhood shopping centres also provides the ideal opportunity to take exhibitions across the town.

Four other issues of concern about the EFDC Local Plan

Since we have had the opportunity to talk to residents in Harlow about this Plan, four key issues have been raised with us.

1 Out of date evidence for the need for new homes across the area.

There is no doubt that we are living in a time of change and that trying to plan for a period as long as 13 years is difficult. It is however clear that a number of material changes have occurred whilst this plan was being prepared. House prices across the country have in 2018 seen the lowest increases since 2013 and in London they have actually fallen by 1.7%. The loss of jobs in London which have and will it is predicted go abroad following Brexit has already seen the population of London in 2018 decrease for the first time in some 40 years. New rules following Brexit will result in a fall in the number of people coming to this country. The need for such a large number of homes to be built must surely be in doubt.

None of the proposals for new homes on Harlow's borders include any social housing, which is in most need locally, evidenced by the fact that over 400 children are living in temporary accommodation in Harlow. The cheapest new houses presently being built in the area are over £300K even when sold as "affordable". Four bedroomed houses are nearer £500K.

EFDC and HDC have worked very closely together to identify sites and the number of new homes to be built on them. In the last three years alone 1000 flats have been created in Harlow by converting offices into homes. HAP are aware that such conversions have been taking place in the EFDC area. These numbers have not been fully taken into account when both EFDC and HDC have compiled their plans in respect of the number of new homes required. There is clear evidence from alterations to existing Planning Applications and Planning Applications in the pipeline for brown field sites that at least another 1000 homes will be built which do not feature in the supporting documents within the Plans of either Authority.

Allowing the number of homes proposed in this Plan to go ahead in addition to those already built or in the pipeline which are outside of the Plan will simply put even more strain on public services and lead to more congestion on Harlow's roads.

2 Inadequate plans for new and improved roads.

Compared with other post war New Towns, only a very small number and length of dual carriageways were built in Harlow.

Provision was made so that in the future they could be widened, evidenced by wide verges and the width of underpasses. Roads across the town are already heavily congested during much of the day. Residents have expressed concerns that thousands of additional homes on Harlow's borders will only add to the problem and that a much bigger investment is needed, than is identified in the Plan. The creation of thousands of jobs at either end of Harlow, but building homes on the other borders surely meant that the four Local Authorities should have appointed just one consultant to look at this issue?

3 Consultation on Infrastructure

The lack of consultation on all aspects of infrastructure with regard to Education, Health and Transportation is evident in the way that two schemes drawn up by different consultants were published well after publishing of the Local Plans for both EFDC and HDC (ARUP Dec 2017 and Atkins March 2018). It has therefore completely ignored any views or objections on all aspects of the infrastructure that could and should have been clearly brought to the attention of residents of Epping, Harlow and East Hertfordshire.

Harlow residents have not been consulted on many aspect and in particular plans to build an electrified busway linking the proposed new developments on Harlow's boundaries that will clearly have many consequences for the existing population, not least the loss of green open spaces. The fact that joint working arrangements did not include the use of the same two consultants when drawing up the transport infrastructure plan has led to the fact that this appeared in EFDC's Plan, without the knowledge of Harlow residents who were thus unable to comment on an issue which directly affects them.

The loss of green space in Harlow raises the issue of whether EFDC'S Plan is "sound".

4 The Gilston Garden Town

This development will have a significant affect on residents living and or working in Harlow if only because of the likely increase in traffic on Harlow's roads.

Whilst the EFDC Local Plan does mention these proposals, they are clearly linked in more ways than one and affect Harlow as a whole. Whilst public meetings have been held elsewhere about these proposal, the residents of Harlow have not formally been consulted or indeed advised directly by East Herts Council.

In summary

The Harlow Alliance Party, along with hundreds of resident living in Harlow believe:

That they have not been properly consulted or kept informed during the process of drawing up this Plan. The need for EFDC to do this was clearly demonstrated early on at Latton Priory and Sumners but not maintained in the latter stages. In respect of Katherine's it never started.

The plans for new infrastructure have been poorly drawn up and are wholly inadequate.

The data used to compile house numbers is clearly out of date.